

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

**IN RE: Janice K. Williams**

**Debtor**

\* \* \* \* \*

**Hard Money Bankers, LLC**

**Movant**

**vs.**

**Janice K. Williams**

**Respondent**

\* \* \* \* \*

**CASE NO.: 18-25973**

**Chapter 13**

**RESPONSE TO MOTION FOR RELIEF FROM STAY**

The Debtor/Respondent, through her counsel, Charlene A. Wilson, responds to the Motion filed by the Movant as follows:

1. The Debtor/Respondent denies that allegation (s) contained in the Motion.
2. The plan filed makes clear that all amounts due to the Movant will be paid in the plan in full with interest.
3. The property has significant equity and therefore the Movant is overly protected.
4. The debtor would like an opportunity to be heard on this matter..

**WHEREFORE**, the Debtor/Respondent respectfully requests that this Honorable Court deny the Motion for Relief From Stay.

Respectfully submitted,

*/s/ Charlene A. Wilson*

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Charlene A. Wilson, Esquire  
1 North Charles Street, Suite 1905  
Baltimore, Maryland 21201  
(410)332-8000  
Bar No.: 11947

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of February, 2019, a true copy of the foregoing Response to Motion for Relief From Stay was forwarded electronic to all individuals and/or entities requesting electronic notification, including Robert S. Thomas, III, Chapter 13 Trustee, 300 E. Joppa Road, Suite 409, Towson, MD 21286, [ecf@ch13balt.com](mailto:ecf@ch13balt.com) AND mailed first class prepaid mail to Movant's Counsel, Benjamin P. Smith, Esquire, Shulman, Rogers, Gandal, Pordy & Ecker, PA, 12505 Park Potomac Avenue, 6<sup>th</sup> Floor, Potomac, MD 20854.

*/s/ Charlene A. Wilson*

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Charlene A. Wilson, Esquire